

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: TRIBUNE COMPANY FRAUDULENT CONVEYANCE LITIGATION	Consolidated Multidistrict Action 11 MD 2296 (RJS)  ECF Case
THIS DOCUMENT RELATES TO:  MARC S. KIRSCHNER, as Litigation Trustee for the TRIBUNE LITIGATION TRUST, <div style="text-align: right;"><i>Plaintiff,</i></div> <div style="text-align: center;">-against-</div> DENNIS J. FITZSIMONS, <i>et al.</i> , <div style="text-align: right;"><i>Defendants.</i></div>	No. 12 CV 2652 (RJS)

**NOTICE OF PLAINTIFF'S MOTION TO COMPEL**

Please take notice that upon the accompanying Declaration of William F. Mongan in Support of the Motion and the accompanying memorandum of law, Plaintiff Marc S. Kirschner, as Litigation Trustee ("Plaintiff" or the "Trustee") for the Tribune Litigation Trust, through his undersigned counsel, respectfully moves this Court, pursuant to Federal Rule of Civil Procedure 37, for entry of an order directing Respondents to produce the documents currently withheld as privileged.

Pursuant to the Court's Order of November 29, 2017 [ECF No. 7201], Respondents are required to file any opposition to the motion by January 8, 2018.

Dated: December 15, 2017  
New York, New York

Respectfully submitted,

**FRIEDMAN KAPLAN SEILER &  
ADELMAN LLP**

By: /S/ Robert J. Lack  
Robert J. Lack  
Jeffrey R. Wang  
Christopher M. Colorado  
7 Times Square  
New York, NY 10036  
Tel: (212) 833-1100  
rlack@fklaw.com  
jwang@fklaw.com  
ccolorado@fklaw.com

**AKIN GUMP STRAUSS HAUER & FELD  
LLP**

By: /S/ David M. Zensky  
David M. Zensky  
William F. Mongan  
One Bryant Park  
New York, NY 10036  
Tel: (212) 872-1000  
dzensky@akingump.com  
wmongan@akingump.com